

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

D.V.D.; M.M.; E.F.D.; and O.C.G.,

Plaintiffs,

v.

U.S. DEPARTMENT OF HOMELAND SECURITY;
Kristi NOEM, Secretary, U.S. Department of
Homeland Security, in her official capacity; Pamela
BONDI, U.S. Attorney General, in her official
capacity; and Antone MONIZ, Superintendent,
Plymouth County Correctional Facility, in his official
capacity,

Defendants.

Civil Action No. 25-cv-10676-BEM

**PLAINTIFFS' MOTION FOR AN INDICATIVE RULING
UNDER FEDERAL RULE OF CIVIL PROCEDURE 62.1**

Plaintiffs respectfully request that the Court grant Plaintiffs' Motion for an Indicative Ruling under Federal Rule of Civil Procedure 62.1 to dissolve the previously issued preliminary injunction if the U.S. Court of Appeals for the First Circuit remands the appeal of the preliminary injunction in Case No. 25-1393. The grounds for this motion are set forth in the accompanying memorandum of law, exhibits in support thereof, the Complaint, this Court's and the Supreme Court's prior rulings on the preliminary injunction, and the applicable law. A proposed order also accompanies this motion.

REQUEST FOR ORAL ARGUMENT

Pursuant to Local Rule 7.1(d), Plaintiffs believe that the Court can rule on the motion without further hearing but will be available in the event the Court schedules a hearing.

Respectfully submitted,

s/Trina Realmuto

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** Admitted pro hac vice*

July 15, 2025

CERTIFICATE OF COMPLIANCE WITH LOCAL RULE 7.1(a)(2)

I certify that, in accordance with Local Rule 7.1(a)(2), I emailed Defendants' counsel Mary Larakers, Matthew Seamon, and Elianis Perez on July 15, 2025 at 9:11 am to inform counsel that Plaintiffs intended to file this motion. As of the time of this filing, Defendants have not yet provided a position.

s/ Trina Realmuto
Trina Realmuto

CERTIFICATE OF SERVICE

I, Trina Realmuto, hereby certify that on July 15, 2025, I caused a true and correct copy of the foregoing document to be filed with the Clerk of Court by using the CM/ECF system, which will send a notice of the electronic filing to counsel of record for all parties.

/s/ Trina Realmuto

Trina Realmuto

National Immigration Litigation Alliance